

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

HODELL-NATCO, INC.)	CASE NO.: 1:08CV2755
)	
Plaintiff,)	JUDGE WELLS
)	
vs.)	<u>RULE 26(a) INITIAL DISCLOSURES</u>
)	<u>OF LSI-LOWERY SYSTEMS INC. AND</u>
SAP AMERICA, INC., et al.)	<u>IBIS GROUP</u>
)	
Defendants.)	

LSi-Lowery Systems Inc. and the former entity known as IBIS Group Inc., pursuant to Federal Rule of Civil Procedure 26(a) submits the following initial disclosures, in addition to information previously disclosed in response to discovery:

I. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION

1. Daniel J. Lowery – President LSi-Lowery Systems Inc.; may be contacted through the undersigned counsel.
2. Cain Woodrum, LSi-Lowery Systems Inc. employee, may be contacted through the undersigned counsel.
3. John Woodrum, V.P. Business Software Support - former LSi-Lowery Systems Inc. employee, may be contacted through undersigned counsel.
4. Joe Guaganti, former LSI Systems employee, may be contacted through undersigned counsel.
5. Gary Seeker, LSI Systems
6. Avery Myrick, LSI Systems
7. Dale Van Leeuwen, IBIS, LSI Systems
8. Patricia McGrath, LSI Systems Tech.
9. Eric Johnson, LSI Systems Tech.

10. Marcia Weissman, LSI Systems Tech.
11. Ellen Daniels, Hodell-Natco employee
12. Terry Phillips, Hodell-Natco IT Project Manager.
13. Joe Viskocky, Hodell-Natco employee.
14. Otto Reidl, President of Hodell-Natco.
15. Kevin Reidl, Chief Operating Officer of Hodell-Natco.
16. Paul Killingsworth, SAP.
17. Daniel Kraus, SAP.
18. Michael Sotnick, Sr. VP, SAP.
19. Gadi Barnea, SAP
20. Edward Nevuex, SAP
21. Manfred Weis, SAP
22. Dirk Boessman, SAP
23. Geoffrey Ashley, SAP
24. Ross Elliott, Accellos/Radio Beacon

II. PRODUCTION OF DOCUMENTS

The following categories of documents in the possession, custody or control of LSI-Lowery, all of which are located on LSI servers or in their offices in St. Louis, Missouri, consist of:

1. E-Mails
2. Paperwork, contracts and agreements

3. Pursuant to discussions of counsel, the following search terms for electronically stored documents are proposed as non-exclusive methods of identifying documents that may lead to the discovery of relevant documents:
 - i. DI-API
 - ii. Performance
 - iii. Freeze or Freezes
 - iv. Slow
 - v. Open issue list

III. COMPUTATION OF DAMAGES

Not applicable to this party

IV. INSURANCE AGREEMENTS

The following policy of insurance may provide professional liability coverage applicable to some or all of the claims asserted in this action:

Philadelphia Indemnity Insurance Company
Professional Liability Policy
Policy No. PHSD319209
Effective dates 4/23/2008 through 4/23/2009
Limit of Liability: \$1,000,000.00
Annual Aggregate: \$1,000,000.00

Respectfully submitted,

/s/ Roy A. Hulme
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Attorney for Defendants LSi-Lowery
Systems, Inc. and The IBIS Group, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Rule 26(a) Initial Disclosures was served by regular mail and email the 22nd day of June, 2010 upon:

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/s/ Roy A. Hulme
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